



Loudoun County
Virginia

Year 4 VPDES Annual Report

Permit No. VAR040067

In Compliance with the
Virginia Pollutant Discharge Elimination System and
Virginia State Water Control Law
August 1, 2007



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**VPDES General Permit for
Small Municipal Separate Storm Sewer Systems Permit
No. VAR040067**

Year 4 Annual Report
August 1, 2005 – July 31, 2007

Loudoun County, Virginia



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August 1, 2005 – July 31, 2007
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1 Introduction

This Annual Report has been prepared by the Loudoun County Department of General Services to comply with the requirements of the Virginia Pollution Discharge Elimination System (VPDES) General Permit for Discharges of Storm Water from Small Municipal Separate Storm Systems. Under 9VAC25-31-10 *et seq* of the Code of Virginia, Loudoun County developed and submitted a Registration Statement and Stormwater Management Plan to the Virginia Department of Environmental Quality (VDEQ) to address six minimum control measures aimed at reducing the discharge of pollutants to the "maximum extent practicable." Minimum control measures include:

1. Public Education and Outreach	4. Construction Site Runoff Control
2. Public Participation and Involvement	5. Post-Construction Runoff Control
3. Illegal Discharge Detection and Elimination	6. Pollution Prevention and Good Housekeeping

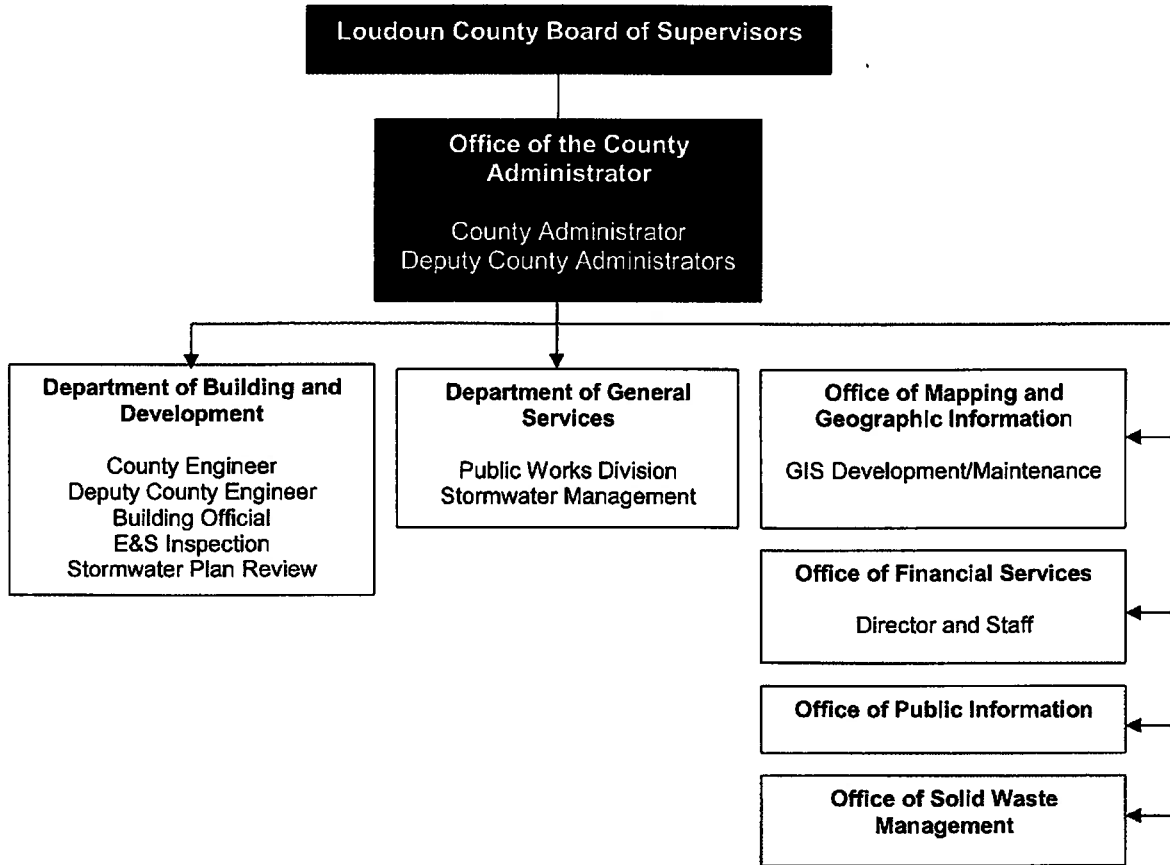
The Department of Environmental Quality issued General Permit VAR040067 to Loudoun County on July 8, 2003. Under the terms of the General Permit, the County must submit a report covering Years 3 & 4 no later than August 1, 2007. Part II.E.2 of the General Permit outlines the requirements for the Annual Report.

"The permittee must submit an annual report to the Director by the first, second, and fourth anniversaries of the date of coverage under this permit. The reports must include:

- a. The status of compliance with permit conditions, an assessment of the appropriateness of the identified best management practices and progress towards achieving the identified measurable goals for each of the minimum control measures;
- b. Results of information collected and analyzed, including monitoring data, if any, during the reporting period;
- c. A summary of the stormwater activities the permittee plans to undertake during the next reporting cycle;
- d. Changes in any identified best management practices or measurable goals for any of the minimum control measures;
- e. Notice that the permittee is relying on another government entity to satisfy some of the permit obligations, if applicable; and,
- f. The approval status of any qualifying local programs (if appropriate), or the progress towards achieving full approval of these programs."

Each reporting requirement is addressed in the following sections. The organizational chart below outlines County agencies with major stormwater management functions or responsibilities that are referenced in this Annual Report. The Environmental and Historic Resources Program has been dissolved since the Year 1 Annual Report. Control measures that this agency was responsible for have been transferred to General Services.

Stormwater Management Organizational Chart



2 Status of Compliance with Years 3 & 4 Permit Conditions

The following provides the status of ongoing permit requirements implemented during Years 1 and 2, as well as permit requirements due for implementation during Years 3 and 4 for each of the six minimum control measures. At the beginning of each section is a summary table describing the task, the implementation year, the measurable goal as described in the County's adopted Stormwater Management Plan, and the completion status. Following the summary table is a more detailed discussion of Year 3 and 4 activities related to each task.

2.1 Public Education and Outreach (MCM#1)

The following table is a summary of Year 1 through 4 activities for Minimum Control Measure #1 and their completion status.

BMP/Task	Year	Measurable Goal	Status
A. SWM News Releases	1	Implement by end of PY1, two times/year.	Current and ongoing with changes. County has focused on other methods of education.
B. Publicize HHW Days	1	Report on efforts.	Current and ongoing.
C. Publicize Non-Government SWM Efforts	1	Notify groups of opportunities.	Current and ongoing.
D. Implementation Progress Reports	1	Post to web site.	Current and ongoing.
E. Cable TV Test Broadcast Message	2	By end of PY2, seasonal message 4x/yr.	Current and ongoing with changes. County is participating in an educational radio campaign.
F. SWM Speakers Bureau	2	By end of PY2, organized and advertised.	Complete.
G. WQ/SWM Materials to LCPS	3	Disbursed by end of PY3.	Current and ongoing.
H. LC Env./Outreach Web Site	3	Begin by end of PY3.	Complete.
I. SWM Infrastructure CDs Available	3	Available by end of PY3.	Current with changes.
J. SWM Materials Available from LC Web Site	4	Available by end of PY4.	Complete

2.1A Stormwater Management News Releases

This task required that the County develop two news releases each year on stormwater management related issues. It was modified during Year 2 to a requirement for developing and distributing educational materials and tracking the materials distributed. During Years 3 and 4, the County has continued to keep updated information on the County's Web site pertaining to stormwater, initiated a new program for applying informational decals to stormwater inlets, and

conducted a public informational meeting to educate both individuals and Homeowners' Associations about pollution prevention and the County's Stormwater Management Program.

Beginning in Year 3 and continuing through Year 4, the County established a program where "No Dumping—Drains to River" decals and adhesive patches were purchased and supplied to individuals who wished to apply them to stormwater inlet boxes. The County supplied the decals, GIS maps depicting the inlet boxes, and the VDOT permit allowing access to the rights-of-way. So far, four projects have been completed and about 1500 decals applied. Participants have been environmentally conscious high school students, eagle scouts, and one land developer. A copy of the VDOT permit, the decal placement diagram, and a map of one large project are included in Appendix A.

On June 5, 2007, the County conducted a Public Information Meeting informing residents and Homeowners' Associations about stormwater pollution issues, the County's Stormwater Management Program, and upcoming efforts at regulation enforcement. Invitations were mailed out to 135 HOAs and a news release appeared on the County Web site. A copy of the News Release and excerpts from the presentation are included in Appendix A.

2.1B Publicize Household Hazardous Waste Days

This task required the County to document on-going efforts to advertise its Household Hazardous Waste (HHW) Program. The County continued to aggressively publicize the program through news releases, flyers included with tax bills, flyers mailed to individuals by request, and through Web-based materials (see Appendix A). In each of Years 3 and 4 (2006 and 2007), the Office of Solid Waste Management sponsored eight collection events. The events were held on Saturdays and spread throughout the County to address the needs and demands of a growing population. Residents brought materials and disposed of them free-of-charge. Used motor oil, antifreeze, and automobile batteries were not accepted at the events since they can be recycled year-around at the County's Solid Waste Management Facility at no charge.

2.1C Publicize Non-Government Stormwater Management Efforts

This task required the County to determine appropriate communication outlets for publicizing non-government stormwater management efforts. As a major part of the County's overall VPDES public education and outreach efforts, the Department of General Services has developed a Stormwater Program Web page located at www.co.loudoun.va.us/genserv/stormwater/index.htm (see Appendix A). The Department of General Services has used the Web page, as well as press releases, to publicize non-government stormwater management efforts and volunteer opportunities.

During Year 3 of the permit, the County participated in the Loudoun Watershed Watch organization (www.loudounwatershedwatch.org) – the executive summary of a water quality assessment State of the Streams Loudoun County: 2005 prepared by Darrell Schwalm, of that organization, is included in Appendix A.

On October 8, 2005, the 4th Annual Family Stream Day was held at Broadlands community Center. Loudoun County General Services staffed a Station for 'Tracking Stormwater'. On an 8-foot map, children located their house and with a highlighter, tracked the flow through the pipe network and streams to the Potomac River. This provided a visual connection between the water flowing down the curb and the Chesapeake Bay. On October 14, 2006, the 5th Annual Family Stream Day was held at Seneca Ridge Middle School. Loudoun County General Services staffed a station teaching about stormwater pond function and maintenance.

Throughout 2006, the Department of Building and Development organized an effort known as Strategy for Watershed Management Solutions or SWMS to coordinate existing watershed efforts and define a shared vision for watershed activities across Loudoun County. It was funded by the County and grants from the National Fish and Wildlife Foundation and the U.S. Environmental

Protection Agency. A Web page detailing that effort was created on the County Web site at www.loudoun.gov/b&d/watershed.htm.

On April 13, 2007 the Loudoun County Public Schools sponsored the Loudoun County Environmental Education Conference to discuss the needs, opportunities, and challenges of providing environmental education and stewardship opportunities for Loudoun County. A copy of the attendees' acknowledgement letter is contained in Appendix A.

Other non-government efforts that took place during the period were the 2006 Virginia Waterways Cleanup Day sponsored by Clean Virginia Waterways, the Tuscarora Creek Watershed Stakeholder Meeting hosted by Piedmont Environmental Council and the Center for Watershed Protection, the Potomac River Watershed Cleanup sponsored by the Alice Ferguson Foundation, and the Dominion High School Sugarland Run water quality study.

Information on these activities is contained in Appendix A.

2.1D Implementation Progress Reports

This task required the County to post its Annual Report on the County Web site. The County has previously posted the Year 1 and Year 2 Annual Reports on the Stormwater Program page of the County's Web site. After approval by the Virginia Department of Conservation and Recreation (DCR), the County will post the Year 4 Annual Report.

2.1E Cable TV Text Message Broadcast

This task required the County to broadcast educational material concerning stormwater management/surface water quality through a scrolling text message on the "Community Bulletin" cable television channel.

Instead of broadcasting scrolling text messages on cable television, the County is participating in a program through the Northern Virginia Regional Commission (NVRC) called "Clean Water Partners". The County is one of eleven jurisdictions that contribute funds which are used to develop and finance stormwater advertising. A radio campaign featuring a 60-second spot known as "The Call" has aired in 2005, 2006, and 2007. Each year the ad runs for two weeks during one month and two weeks more during the following month. The ad runs approximately 1000 times each year. The 2007 ads rotated three different tag lines at the end of the ad emphasizing fertilizer control, pet waste cleanup, and motor oil disposal. A 30-second public service announcement for television was obtained and distributed to each jurisdiction. Loudoun County will begin airing it soon. A postcard keying on pet waste was developed and is handed out regularly at public functions. Text of "The Call", the postcard, and a news release are contained in Appendix A.

Additionally, the County Public Information Office produced a 15-minute interview with General Services stormwater pond expert Boyd Church on the subject of pond maintenance and aired it sixteen times in April, 2007 on "Inside Loudoun County" over Government Channel 2. A news release about the spot is contained in Appendix A.

2.1F Stormwater Management Speakers Bureau

This task required the County to develop a stormwater "speakers' bureau" program on stormwater management/surface water quality and promote the program's availability to local groups and organizations. This task was completed in Year 2.

2.1G Water Quality/Stormwater Management Materials to Loudoun County Public Schools

This task required the County to identify appropriate Loudoun County Public Schools (LCPS) contacts and determine how the County can help the LCPS take full advantage of existing environmental education programs. Loudoun County General Services staff met with Odette Scovel, the Science Instructional Supervisor for Loudoun County Public Schools, during Year 3. At her direction, a presentation was made to the high school and middle school Environmental

Science Teachers Forum where aid was offered in the form of posters, the EPA video "After the Storm", speakers, and the storm drain decal program. A list of the science teachers who have received either posters or the video and copies of the posters are contained in Appendix A.

2.1H Loudoun County Environmental/Outreach Web Site

This task required the County to develop an environmental education and outreach page on the County Web site. The County Public Information Office created a Public Information and Participation Web page found at www.loudoun.gov/genserv/stormwater/public.htm. The page contains links to other pages offering posters, anti-pollution brochures, conservation tips, etc. A copy of the page is included in Appendix A.

2.1I Stormwater Management Infrastructure Compact Discs Available

This task required the County to produce and make available to the public a compact disc detailing the stormwater infrastructure within the permit area. Instead of creating and trying to distribute CDs, Loudoun County added two stormwater layers, one for structures and one for pipes, to Web Logis, the County's online mapping system. The Web address for the mapping system is: <http://gisinter1.loudoun.gov/weblogis/agree.htm>. On this page, the user can bring up and plot maps showing various features such as roads, buildings, streams, and now the stormwater system. A sample map is contained in Appendix A.

2.1J Stormwater Management Materials Available from the Loudoun County Web Site

This task required the County to make stormwater management materials, such as guidance documents and ordinances, available on the County Web site. The Stormwater Management Program Web page, mentioned in 2.1C, contains links to all of the pertinent guidance documents and ordinances.

2.2 Public Involvement/Participation (MCM#2)

The following table is a summary of Year 1 through 4 activities for Minimum Control Measure #2 and their completion status.

BMP/Task	Year	Measurable Goal	Status
A. Public Information Session on Phase II	1	By end of PY1, conduct one session.	Complete.
B. Citizen Feedback Line for SWM Issues	1	By end of PY1, advertise customer service number.	Complete.
C. Utilize WRTAC to Provide Input to SWM Program	1	By end of PY1, brief WRTAC two time/year.	Current and ongoing.
D. Highlight Non-Government Involvement Opportunities	2	Posted to County website by end of PY2; updated 2x/yr.	Current and ongoing.
E. Internet "Mail To" Functionality on Web Site	3	By end of PY3, establish "Mail To" button for e-mail inquiries on SWM.	Complete.

2.2A Public Information Session

This task required the County to hold a Public Information Session to describe the VPDES Phase II Program and solicit public comment. This activity was completed during Year 1.

2.2B Citizen Feedback Line

This task required the County implement a feedback line for stormwater and advertise its availability to County residents. This activity was completed during Year 1. The Stormwater Hotline is (703-777-0117) and the Erosion and Sedimentation hotline is (703-737-8746). A stormwater complaint summary is included in Appendix B.

2.2C Water Resources Technical Advisory Committee

This task required the County to brief the Water Resources Technical Advisory Committee (WRTAC) twice each year on the progress of VPDES permit implementation and to solicit input on the future direction of the program. At the beginning of Year 3, the Chief of Stormwater Management was assigned as additional staff support to WRTAC. Interaction with this citizen advisory committee is, therefore, frequent and consistent.

2.2D Highlight Non-Government Involvement Opportunities

This task required the County to highlight stormwater management-related public involvement/participation opportunities available through private/non-government organizations within the County. The County provides information about these opportunities on its Web page; however, the County cannot provide live links to other Web sites due to County IT policy. The County Stormwater Management Program Web page is kept current and easily accessible. It is discussed in items 2.1C, 2.1H, and 2.1J.

2.2E Internet "Mail To" Functionality on Web Site

This task required the County to establish an Internet "mail to" button for e-mail inquiries concerning the County's Stormwater Management Program. This was established during Year 2 and is accessed at <http://www.loudoun.gov/genserv/stormwater/#complaints>.

2.3 Illicit Discharge Detection and Elimination (MCM#3)

The following table is a summary of Year 1 through 4 activities for Minimum Control Measure #3 and their completion status.

BMP/Task	Year	Measurable Goal	Status
A. Citizen Feedback Line for ID Detection	1	By end of PY1, publicize customer service number.	Complete.
B. Review/Supplement Existing Ordinances	1	Review and initiate changes as necessary by end of PY1.	Complete.
C. Conduct Physical Survey and Map System in Eastern Loudoun	1	Complete by end of PY1.	Current and ongoing.
D. Produce Major Outfall Map	2	Complete by end of PY2.	Complete.
E. Outfall Mapping Update Program	3	Begin by the start of PY3.	Complete.
F. Establish SOPs and Training for Major Outfall Inspections	2	Develop SOPs and provide staff with appropriate training and equipment by end of PY2.	Complete.
G. Develop ID Enforcement Ordinance	3	By end of PY3.	Complete.
H. Initial Inspection of Major Outfalls	3	Complete during PY3	Complete.
I. Establish Regular Major Outfall Inspection Schedule	3	By end of PY3.	Complete.
J. Regular Major Outfall Inspections	4	Based on est. schedule, begin in PY4.	Current and ongoing.
K. Implement ID Enforcement Protocol	4	Begin in PY4.	Complete.
L. Establish Coordinated Complaint Tracking System	4	By end of PY4.	Complete.

2.3A Citizen Feedback Line

This task requires the County to implement a feedback line and advertise its availability to County residents. This is the same as that discussed in Item 2.2B and was completed in Year 1.

2.3B Review and/or Supplement Existing Ordinances

This task requires the County to review the existing County Code to ensure that the County has appropriate legal authority to prohibit non-stormwater discharges. This task was completed in Year 1.

2.3C Map the Storm Sewer System in the Suburban Policy Area

This task requires the County to conduct a physical survey and map of the storm sewer system in the County's suburban policy area, which encompasses the area subject to VPDES permit requirements. The County initiated this project in July 2002 (prior to permit application). Nearly 47,000 stormwater structures, including manholes, outlets, curb inlets, and stormwater ponds, have been recorded in the County. Over 43,000 of those are within the 81 square mile suburban policy area. Field crews using Global Positioning Satellite (GPS) visited all stormwater structures and recorded pipe sizes, structure, condition, direction of flow, construction material, and the elevation of the pipe drain inverts. A map of the stormwater structures surveyed to date within the permit area is included in Appendix C.

2.3D Stormwater Outfall Map

This task requires the County to create a separate stormwater outfall map showing all VPDES major outfalls and identifying all receiving streams to which the identified major outfalls discharge. Although this task was completed during Year 2 of the permit, refinements continue and a current map is included in the report binder pocket.

2.3E Outfall Mapping Update Program

This task requires the County to develop a process for the routine update of the stormwater system map. Although the process has been in effect since the beginning of Year 3, it was recently formalized as part of the Stormwater Management Strategic Plan. A copy of the particular Implementation Plan is included in the report binder pocket.

2.3F Outfall Inspection Standard Operating Procedures

This task requires the County to develop SOPs for inspection of major outfalls to detect illicit discharges. This task was completed in Year 2.

2.3G Develop ID Enforcement Ordinance

This task requires the County to develop an illicit discharge enforcement ordinance. This task was completed during Year 1 when the Board of Supervisors adopted Ordinance 1096 on October 20, 2003. The Ordinance contained specific language for illicit discharge enforcement. A copy of the Ordinance is contained in Appendix C.

2.3H Initial Inspection of Major Outfalls

This task requires the County to perform an initial inspection of major outfalls in the County's suburban policy area. At the end of Year 2, major outfalls were identified through a series of GIS queries yielding 12" or greater outfalls in industrial zones and 36" or greater outfalls in other zones. Over 900 outfalls were detected and, in Year 3, all were dry-weather inspected. The results of the inspection are contained in Appendix C.

2.3I Establish Regular Major Outfall Inspection Schedule

This task requires the County to establish a regular inspection schedule for major outfalls, based on an assessment of the results of the initial inspection in Year 3. The inspection in Year 3 showed that the GIS queries used to identify major outfalls had several minor flaws. The most common problem was that many of the outfalls detected, delivered water to an open channel system from which the stormwater again entered a piped system before finally entering Virginia waters. A new assessment was undertaken to search for outfalls of a qualifying size which were the final discharge point into receiving waters. This reduced the number of major outfalls to 630. A schedule of annual inspection for all identified major outfalls was adopted.

2.3J Regular Major Outfall Inspections

This task requires the County to conduct major outfall inspections based on the schedule established in Item 2.3I. In Year 4, the County conducted dry-weather inspections of the 630 major outfalls identified and collected samples of suspicious flows. The results of the inspections and tests are contained in Appendix C. During these inspections, more flaws in the outfall inspection process were encountered. Some of the outfalls were filled with debris so that the inspector could not access the pipe flowline. Others were under water in a constantly wet environment. Still others were incorrectly mapped and could not be found. The County will correct these problems and prepare a more accurate list prior to the next inspection cycle.

2.3K Implement ID Enforcement Protocol

This task requires the County to adopt an enforcement protocol for illicit discharge. The protocol, consisting of education, warnings, and fines was adopted in Year 4 and is contained in Appendix C.

2.3L Establish Coordinated Complaint Tracking System

This task requires the County to develop a complaint tracking system with a database that can be shared with other County Departments. The County purchased the complaint tracking system known as Active Citizen Response and placed it into service near the end of Year 4.

2.4 Construction Site Stormwater Runoff Control (MCM #4)

The following table is a summary of Year 1 through 4 activities for Minimum Control Measure #4 and their completion status.

BMP/Task	Year	Measurable Goal	Status
A. Obtain and Maintain DCR E&S Program Consistency Rating	1	Obtain by end of PY1, maintain thereafter.	Current and ongoing.
B. Utilize DEQ VPDES General Permit for Stormwater Discharges from Construction Activities	1	By end of PY1, require submission, receive copy within two weeks of submission.	Complete.
C. Citizen Feedback Line for SWM Issues	1	By end of PY1, advertise customer services number.	Complete.

2.4A Obtain and Maintain DCR Erosion and Sediment Control Program Consistency

This task requires the County to obtain a rating of "consistent" with the Virginia Erosion and Sediment Control Regulations. The County's Erosion and Sediment Control Program was initially rated consistent per a letter from DCR, dated April 27, 2005. A copy of the letter is contained in Appendix D. A new audit was conducted in March of 2007 and, although the County has been informed that it remains "consistent" a new letter has not yet arrived.

2.4B Stormwater Discharges from Construction Activities

This task requires the County to implement and enforce a requirement that site contractors submit a copy of the VPDES General Permit for Stormwater Discharges from Construction Activities within two weeks of submission to the Virginia Department of Environmental Quality. This task was completed in Year 1.

2.4C Citizen Feedback Line

This task requires the County to implement a feedback line and advertise its availability to County residents. This is the same as that discussed in Item 2.2B and was completed in Year 1.

2.5 Post Construction Stormwater Management (MCM#5)

The following table is a summary of Year 1 through 4 activities for Minimum Control Measure #5 and their completion status.

BMP/Task	Year	Measurable Goal	Status
A. Implement County FSM Requirements and Amend County Code if Necessary	1	Review and initiate changes as necessary by the end of PY1.	Complete.
B. Database of all BMP Owners	1	By end of PY1.	Current and ongoing.
C. Notify all Post-Permit BMP Owners of Requirement to Submit BMP Inspection	2	Advise of reporting requirement by end of PY2.	Per adopted County ordinance, the County is responsible for post permit BMP maintenance.
D. Require Annual BMP Maintenance Reports	4	Process established by end of PY4.	Complete.
E. Implement BMP Maintenance Agreement Enforcement Protocol	4	By end of PY4.	Complete.

2.5A County Facilities Standards Manual Requirements

This task requires the County to implement and enforce water quality BMP requirements equivalent to those in the 1998 Virginia Stormwater Management Handbook. This task was completed during Year 1. The County is currently undergoing a major Facilities Standards Manual (FSM) revision in response to changes in the Zoning Ordinance. The revision is complete, but not yet adopted. However, the FSM revisions continue to honor water quality BMP requirements equivalent or more stringent than those in the 1998 Virginia Stormwater Management Handbook.

2.5B Database of BMP Owners

This task requires the County to track BMP information required by the VPDES General Permit for reporting to the Virginia Department of Environmental Quality. Previous Annual Reports only reported BMPs constructed after adoption of the Permit. Furthermore, they listed the owner of each BMP as the owner of the underlying property. A more recent interpretation of the Stormwater Management Ordinance has led to the understanding that Loudoun County is the owner of all BMPs contained in easements dedicated to the County. This and future reports will list all known BMPs within the permit area and indicate ownership in accordance with the more recent interpretation. The current list is contained in Appendix E.

2.5C Notification of Inspection Requirements

This task requires the County to notify all BMP owners/operators (post permit issuance) of the requirement to submit inspection reports to the County. This notification is no longer needed because the County has taken responsibility for ensuring post-permit BMP maintenance through Ordinance 1096.02(b)(2).

2.5D Require Annual BMP Maintenance Reports

This task requires the County to establish an annual BMP maintenance report process (post permit issuance). This task is no longer necessary because the County has taken responsibility for ensuring BMP maintenance. However, the County will maintain its own maintenance reports. All BMPs will get a complete structural inspection every three years and a general maintenance inspection each year. Maintenance will be performed and tracked on every BMP.

2.5E Implement BMP Maintenance Agreement Enforcement Protocol

This task requires the County to develop and implement an enforcement protocol for BMP maintenance agreements (post permit issuance). This task is no longer necessary because the County has taken responsibility for ensuring BMP maintenance.

2.6 Pollution Prevention/Good Housekeeping for Municipal Operations (MCM #6)

The following table is a summary of ongoing Year 1 and Year 2 activities for Minimum Control Measure #6 and their completion status

BMP/Task	Year	Measurable Goal	Status
A. Identify Ongoing Municipal Pollution Prevention Efforts	1	By end of PY1, report number and frequency of activities identified.	Current and ongoing.
B. Track County Staff Applicator Certifications	1	Establish by end of PY1.	Current and ongoing.
C. SWPPP Evaluation of All County Operations/Facilities	1	Evaluate by end of PY1.	Complete.
D. Develop Pollution Prevention SOPs and SOGs for Contractors	2	Develop by end of PY2.	Complete.
E. Develop SWPPPs as Necessary	2	Develop by end of PY2.	Complete.
F. Develop SOPs and SOGs for County Maintenance Practices	2	Develop by end of PY2.	Complete.
G. Pollution Prevention Training for Field Crews, Inspectors and Field Managers.	2	Implement by end of PY2 for up to 25 staff members per year.	Current and ongoing.
H. Train Site Staff on SWPPPs and SOPs/SOGs	3	Beginning in PY3.	Complete.
I. Develop Remedial Action Plans for Sites based on SWPPPs/SOPs and SOGs	3	Developed by end of PY3.	Complete.
J. Execute Remedial Action Plans as Necessary	4	Beginning PY4.	Complete.

2.6A Ongoing Municipal Pollution Prevention Efforts

This task requires the County to identify ongoing pollution prevention efforts relating to municipal operations. The Year 2 report stated that the County engaged in two primary pollution prevention efforts, including (1) sweeping operations for school and County facility parking areas and (2) the application of magnesium chloride versus sodium chloride for snow/ice removal at County facilities and parking areas. Since that time, the sweeping operations have been shifted entirely to the schools.

2.6B Track County Staff Applicator Certifications

This task requires the County to establish a formal mechanism to track training and certification status for land application of controlled substances. The County has created an in-house process for collecting this information each year in January. The following is an overview of currently held certifications.

Department Number of Certificates	
Extension Service	3
General Services	2
Parks and Recreation	6
Health Department.....	2
Public Schools.....	2
Total	15

2.6C SWPPP Evaluation of All County Operations/Facilities

This task requires the County to identify County facilities and operations that have the potential to impact stormwater quality and to evaluate these facilities for potential Storm Water Pollution Prevention Plan (SWPPP) development. This task was completed during Year 1.

2.6D Develop Pollution Prevention SOPs and SOGs for Contractors

This task requires the County to develop standard operating procedures (SOPs) and standard operating guidelines (SOGs) for the prevention of stormwater pollution to be followed by all County employees and contractors. This task was completed during Year 2.

2.6E Develop SWPPPs as Necessary

This task requires the County to develop SWPPPs as necessary based on the assessment in 2.6C. This task was completed during Year 2.

2.6F Develop SOPs and SOGs for County Maintenance Practices

This task requires the County to develop stormwater pollution prevention SOPs and SOGs specifically for County maintenance practices. This task was completed during Year 2.

2.6G Pollution Prevention Training for County Staff

This task requires the County to train field crews, inspectors, and field managers on the County's pollution prevention SOPs and SOGs developed in 2.6F. A powerpoint presentation for training staff was developed for the SWPPP facilities and a copy of this presentation is included in Appendix F. This powerpoint presentation has been used to train staff at other locations as well. The training was provided at various times and locations on over the previous year.

2.6H Train Site Staff on SWPPPs and SOPs/SOGs

This task requires the County to train staff of facilities for which SWPPPs are required to be developed on the SWPPP and the SOPs/SOGs. The County has no facilities in the permit area that require SWPPPs. However, SWPPPs were developed on two County facilities and staff has been trained using a PowerPoint presentation that was included in the Year 2 report and the SOPs/SOGs developed for the facilities.

2.6I Develop Remedial Action Plans for Sites based on SWPPPs/SOPs and SOGs

This task requires the County to develop remedial action plans based on the findings of any required SWPPPs. No need was found for the development of remedial action plans on County facilities within the permit area.

2.6J Execute Remedial Action Plans as Necessary

This task requires the County to execute remedial action plans developed in Item 2.6I. No remedial action was required on County facilities within the permit area.

3 Results of Information Collected

3.1 Regulated Land Disturbing Activities

In accordance with MCM #4, the County must track regulated land disturbing activities for the reporting period for submittal with the Annual Report. Information that must be submitted includes total number of regulated land disturbing activities, and total disturbed acreage. The County tracks and reports land disturbing activities on a calendar year basis.

For the year ending December 31, 2005.

Grading Permits Issued	299
Grading Permits Recorded Disturbed Acres.....	3,071.58
Number of Rural Agreements in Lieu of Plans	286
Estimated Disturbed Acreage for Agreements	286
Total Locality Disturbed Acres.....	3,357.58

For the year ending December 31, 2006.

Grading Permits Issued	225
Grading Permits Recorded Disturbed Acres.....	2,573.23
Number of Rural Agreements in Lieu of Plans	204
Estimated Disturbed Acreage for Agreements	204
Total Locality Disturbed Acres.....	2,777.23

3.2 BMP Tracking

In accordance with MCM #5, the County must track all permanent BMPs installed in the permit area and submit the following information with the Annual Report: (1) type of BMP installed; (2) geographic location; (3) waterbody the BMP is discharging into; (4) number of acres treated; and (5) whether or not the BMP is inspected or maintained, and how often the BMP is maintained. A spreadsheet containing the required information on all known BMP facilities is included in Appendix E. In that spreadsheet, the "Owner" is listed as Loudoun County if easements to the County have been identified. Research is continuing on the rest of them. Information in the "Geographic Location" field is the Hydrologic Unit Number. "Acres Treated" is a calculated acreage based on the volume of the pond. Actual drainage area acreage determinations will commence during Year 5.

4 Summary of Year 5 Planned Activities

BMP/Task	Year	Planned Activity
I.K. Outreach Materials in a 2 nd Language	5	At least one targeted educational outreach piece will be available by the conclusion of the current VPDES MS4 Permit Period

The Year 5 Annual Report will include a description of ongoing activities from Years 1 through 4 and the compliance status of measurable goals planned for Year 5.

5 Changes in Identified BMPs or Measurable Goals

The Environmental and Historical Resource program was responsible for several control measures in the County's Notice of Intent. Since that program has been dissolved, responsibility for those control measures has been reassigned to General Services. Below are proposed changes to identified BMPs and measurable goals.

BMP/Task	Year	Measurable Goal	Proposed Change
I.A. SWM News Releases	1	Implement by end of PY 1, 2x/yr	Develop and distribute educational materials. Track number of materials distributed.
I.E. Cable TV Text Broadcast Message	2	By end of PY 2, seasonal message 4x/yr	County has developed a TV program on stormwater that airs on the cable TV station and is participating in a radio campaign.
I.H. Environmental/ Outreach Web site	3	The County will develop an environmental education and outreach page by the conclusion of Permit Year 3.	Due to changes in the County's IT policy, the County cannot provide live links from its Web site. Education and outreach information will be provided on the stormwater page with easier access from the County's home page.
I.I SWM Infrastructure CDs Available	3	Available by end of PY3.	The County has a mapping feature called WebLogis where the public can see many of the County's GIS layers and make maps from it. Rather than produce CDs and try to effectively distribute them, the County just added stormwater layers to WebLogis.
V.C. Notify all Post-Permit BMP Owners of Requirement to Submit BMP Inspection	2	Advise of Reporting Requirement by end of PY2.	Per an adopted ordinance, the County will be responsible for ensuring post-permit BMP maintenance. Therefore, this measure is no longer necessary.

6 Reliance On Other Government Entities

Loudoun County is not currently relying on another government entity to satisfy VPDES permit requirements.

7 Approval Status of Qualifying Local Programs

As of April 27, 2005, Loudoun County's Erosion and Sediment Control Program has been rated consistent by DCR.